

III. REMARKS

Applicants have considered the current Office Action with mailing date of June 13, 2008. Claims 1-10 are pending in this application. By this amendment, claims 1, 7 and 10 have been amended. Applicants are not conceding in this application that those claims are not patentable over the art cited by the Office. The present claim amendments and cancellations are only for facilitating expeditious prosecution of the allowable subject matter noted by the Office. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants respectfully reserve the right to pursue the full scope of the subject matter of these original claims and other claims in one or more subsequent patent application that claim(s) priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1, 7, and 10 are rejected under 35 U.S.C 112, second paragraph, as allegedly being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Claims 7 and 10 are further rejected under 35 U.S.C. 112, first paragraph, as allegedly containing subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor(s), at the time the application was filed, had possession of the claimed invention, and as allegedly containing subject matter which was not described in the specification in a way as to enable one skilled in the art to make and/or use the invention. Claims 1-10 are rejected under 35 U.S.C. 102(e) as allegedly being anticipated by Bau, III et al. (U.S. 2003/0023957), hereinafter “Bau.”. Applicants respectfully traverse the Office’s rejection on the followings grounds.

With respect to the Office's 35 U.S.C. 112, second paragraph, rejections of claims 1, 7, and 10, Applicants have reviewed the claims and have amended the claims to recite "... a called web service" in place of the former "...the called web service." Applicants submit that any alleged cases of insufficient antecedent basis for the limitations no longer exist. Accordingly, Applicants respectfully request that the 35 U.S.C. 112, second paragraph, rejections of claims 1, 7, and 10 be withdrawn.

With respect to the Office's 35 U.S.C. 112, first paragraph, rejections of claims 7 and 10, Applicants submit that the specification of the claimed invention does disclose "registering the at least one client request to call a web service within the callback web service, while simultaneously invoking the called web service by sending the at least one client request to call a web service to the called web service." Applicants submit that page 7 of the specification discloses registering the at least one client request, and recites:

Simultaneously, the callback web service 106 acting for the client requester 104 forwards the initial request to the requested web service 'A' 108 in the form of a second web service call (arrow 118) formatted in a second request having the same format as the initial request (arrow 114) issued from the client requester 104.

Applicants submit that the specification further discloses the above subject matter in figures 1-2. However, in order to further prosecution, Applicants have amended the claims to recite "...and invoking..." in place of "...simultaneously invoking...". Accordingly, Applicants respectfully request that the 35 U.S.C. 112, first paragraph rejections of claims 1 and 7 be withdrawn.

With respect to independent claims 1, 7, and 10, Applicants continue to assert that Bau fails to disclose each and every feature of the claimed invention. For example, Bau fails to disclose, *inter alia*, "client requester means for issuing client requests comprising at least one

client request to call a web service, wherein the at least one client request to call a web service is sent to a callback web service.” More specifically, Bau does not disclose a separate element (a callback web service) that receives the client request and subsequently sends the request to the web service. On the contrary, Bau discloses “web services 104 receive a message over networking fabric 100 from a remote device such as user client 112 (802).” (See paragraph [0072]; see also paragraph [0031] “At run time, enhanced web services 104 of the present invention receives messages from remote clients requesting that one or more web service methods be invoked.”). In other words, as understood by Applicants, Bau discloses the client requests to be sent directly over the network to the web services. Bau does not disclose a callback web service that receives the client request. In the Office Action, the Office disagrees, and submits that “based on the reasonably broadest interpretation” (page 8 Office Action) Bau teaches the above subject matter. The Office asserts that the “language of the claim does not require a separate element such as a callback web service as argued by applicant” (page 8 Office Action). Accordingly, Applicants have amended the claims to recite “wherein the callback web service is distinct from the client requester means and the response web service means,” wherein support of such an amendment can be seen in figures 1-2.

Furthermore, Applicants reassert the arguments previously made in the Amendments of December 17, 2007 and May 15, 2008 that Bau fails to disclose “response web service means coupled to the callback web service means for receiving a response to the at least one client request to call a web service and coupled to the client requester means for delivering the response when a client request to obtain the response is issued from the client requester means.” In the Office Action, the Office asserts that “it is still irrelevant for Applicants to argue that a response

to a client request is automatically or manually delivered when the response becomes available because that feature is not in the claim.” See Office Action, page 9. However, Applicants continue to respectfully assert that the feature is in the claim and that the response in the claimed invention is only delivered **when the client requester issues a request to obtain the response from the response web service**. In Bau, a response to a client request is automatically delivered to a caller by a proxy object when the response becomes available. However, in order to further prosecution, Applicants have amended the claim to recite “client requester means for manually delivering the response based upon when a client request to obtain the response is issued from the client requester means.” Applicants submit that the amended claims clearly claim whether or not the response is automatically or manually delivered as set forth by the Office.

As such, Applicants assert that Bau fails to disclose each and every feature of independent claims 1, 7, and 10. Applicants request that the Office withdraw the rejections with respect to these claims. Since claims 2-6 and 8-9 depend from independent claims, Applicants respectfully submit that these claims are also allowable.

However, should the Office maintain the rejections, Applicants request that the Office further clarify how Bau allegedly discloses client requester means for issuing client requests comprising at least one client request to call a web service, wherein the issued client requests are sent to a callback web service, and wherein the callback web service is its own separate element. Further, Applicants request that the Office further clarify how Bau discloses a response web service means coupled to the callback web service means for receiving a response to the at least one client request to call a web service and coupled to the client requester means for manually delivering the response based upon when a client request to obtain the response is issued from

the client requester means.

IV. CONCLUSION

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the number listed below.

Respectfully submitted,

Date: July 25, 2008

/Michael F. Hoffman/
Michael F. Hoffman
Reg. No.: 40,019
(JF)

Hoffman Warnick LLC
75 State Street, 14th Floor
Albany, New York 12207
(518) 449-0044
(518) 449-0047 (fax)